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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. 3:17-cv-06748-WHO

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

**SUPPLEMENTAL DECLARATION OF
CIMONE NUNLEY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: February 19, 2020
Time: 2:00 p.m.
Courtroom: 2, 17th Floor
Judge: Hon. William H. Orrick

Trial Date: May 11, 2020
Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated
6 herein and if called upon to testify, I could and would competently testify thereto, except as to
7 those matters that are stated upon information and belief.
8

9 2. Attached hereto and marked as Exhibit A are true and correct copies of various
10 excerpts from the deposition of Plaintiff Demetric Di-az. Defendant Tesla, Inc. (hereinafter
11 "Defendant") marked this document as "confidential" pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.
13

14 3. Attached hereto and marked as Exhibit B is a true and correct copy of a document
15 produced by Defendant in discovery and Bates stamped TESLA-0000060. Defendant marked
16 this document as "confidential" pursuant to the Protective Order and the document should
17 therefore be sealed pursuant to this Order.
18

19 4. Attached hereto and marked as Exhibit C is a true and correct copy of a document
20 produced by Defendant in discovery and Bates stamped TESLA-0000004 to TESLA-0000008.
21 Defendant marked this document as "confidential" pursuant to the Protective Order and the
22 document should therefore be sealed pursuant to this Order.
23

24 5. Attached hereto and marked as Exhibit D are true and correct copies of
25 documents produced by Defendant in discovery and Bates stamped TESLA-0000047 to TESLA-
26 0000048. Defendant marked this document as "confidential" pursuant to the Protective Order
27 and the document should therefore be sealed pursuant to this Order.
28

1 6. Attached hereto and marked as Exhibit E is a true and correct copy of a document
2 produced by Defendant in discovery and Bates stamped TESLA-0000068 to TESLA-0000069.
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Exhibit F is a true and correct copy of a document
6 produced by Defendant in discovery and Bates-stamped TESLA-0000125 to TESLA-0000126.
7 Defendant marked this document as “confidential” pursuant to the Protective Order and the
8 document should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Exhibit G is a true and correct copy of a document
10 produced by Defendant in discovery and Bates-stamped TESLA-0000308. Defendant marked
11 this document as “confidential” pursuant to the Protective Order and the document should
12 therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Exhibit H is a true and correct copy of various
14 excerpts from Volume I of the Deposition of Plaintiff Owen Diaz. Defendant marked this
15 document as “confidential” pursuant to the Protective Order and the document should therefore
16 be sealed pursuant to this Order.

17 10. Attached hereto and marked as Exhibit I is a true and correct copy of various
18 excerpts from Volume III of the Deposition of Plaintiff Owen Diaz. Defendant nextSource, Inc.
19 marked this document as “confidential” pursuant to the Protective Order and the document
20 should therefore be sealed pursuant to this Order.

21 11. Attached hereto and marked as Exhibit J is a true and correct copy of a document
22 produced by Defendant in discovery and Bates stamped TESLA-0000314 to TESLA-0000316.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 12. Attached hereto and marked as Exhibit K is a true and correct copy of a document
2 produced by Defendant in discovery and Bates-stamped TESLA-0000816 to TESLA0000818.
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Exhibit L is a true and correct copy of a document
6 produced by Defendant in discovery and Bates-stamped TESLA-0000317. Defendant marked
7 this document as “confidential” pursuant to the Protective Order and the document should
8 therefore be sealed pursuant to this Order.

9 14. Attached hereto and marked as Exhibit M is a true and correct copy of a
10 document produced by Defendant in discovery and Bates-stamped TESLA-0000185 to
11 TESLA0000186. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 15. Attached hereto and marked as Exhibit N are true and correct copies of
14 documents produced by Defendant in discovery and Bates stamped TESLA-0000540 to
15 TESLA0000544. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 16. Attached hereto and marked as Exhibit O is a true and correct copy of a document
18 produced by Defendant in discovery and Bates stamped TESLA-0000486. Defendant marked
19 this document as “confidential” pursuant to the Protective Order and the document should
20 therefore be sealed pursuant to this Order.

21 17. Attached hereto and marked as Exhibit P is a true and correct copy of a document
22 produced by Defendant in discovery and Bates stamped TESLA-0000488. Defendant marked
23 this document as “confidential” pursuant to the Protective Order and the document should
24 therefore be sealed pursuant to this Order.

1 18. Attached hereto and marked as Exhibit Q are true and correct copies of
2 documents produced by Defendant in discovery and Bates stamped TESLA-0000495 to
3 TESLA0000497. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 19. Attached hereto and marked as Exhibit R are true and correct copies of documents
6 produced by Defendant in discovery and Bates stamped TESLA0000514. Defendant marked this
7 document as “confidential” pursuant to the Protective Order and the document should therefore
8 be sealed pursuant to this Order.

9 20. Attached hereto and marked as Exhibit S is a true and correct copy of a document
10 produced in discovery by Defendant and Bates-stamped TESLA-0000521 to TESLA0000523.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 21. Attached hereto and marked as Exhibit T is a true and correct copy of a document
14 produced in discovery by Defendant and Bates-stamped TESLA-0000533 to TESLA0000534.
15 Defendant marked this document as “confidential” pursuant to the Protective Order and the
16 document should therefore be sealed pursuant to this Order.

17 22. Attached hereto and marked as Exhibit U is a true and correct copy of a document
18 produced in discovery by Defendant and Bates-stamped TESLA-0000594 to TESLA0000597.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 23. Attached hereto and marked as Exhibit V is a true and correct copy of an e-mail
22 exchange between myself and counsel for Defendant Tesla, Inc. Defendant marked this
23 document as “confidential” pursuant to the Protective Order and the document should therefore
24 be sealed pursuant to this Order.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on January 13, 2020 in San Anselmo, California.
3
4

5 DATED: January 13, 2020

By: 

Lawrence A. Organ, Esq.

Navruz Avloni, Esq.

J. Bernard Alexander, Esq.

Cimone A. Nunley, Esq.

Attorneys for Plaintiffs

DEMETRIC DI-AZ AND OWEN DIAZ